

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES of AMERICA,

Case No: 3:12-00069

vs.

NICHOLAS PSILLAS /

MOTION TO CONTINUE THE SEPTEMBER 24, 2013 TRIAL DATE

Comes Now the undersigned counsel for the Defendant Nicholas Psillas and respectfully requests this Honorable Court for a continuance of the presently scheduled September 24, 2013 trial date. In support the undersigned would show as follows:

1. Mr. Psillas is charged in a two count Indictment with an alleged theft, embezzlement and conversion of funds from his company's pension plan.
2. The present trial date is scheduled for September 24, 2013. Counsel will not be able to properly prepare his client's defense by that time.
3. The undersigned has recently received discovery that includes a significant number of financial documents and records that require careful scrutiny. The undersigned will need to consult with financial experts for assistance. There is a Bankruptcy proceeding that has been pending for over five years that has a significant amount of court records to examine. There is civil litigation pending before this Court that needs to be examined where Mr. Psillas is a defendant. There is also a great deal of investigative work that needs to be done to find and interview potential witnesses. Among those witnesses are lawyers

Handwritten notes:
This motion is GRANTED
in the interests of justice
to allow defense counsel
time to prepare for trial
filed
8-15-13